

Reach Neighbourhood Development Plan 2023-2031

**A report to East Cambridgeshire District Council on
the Reach Neighbourhood Development Plan**

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Executive Summary

- 1 I was appointed by East Cambridgeshire District Council in August 2023 to carry out the independent examination of the Reach Neighbourhood Plan.
- 2 The examination was undertaken by way of written representations. I visited the neighbourhood area on 7 September 2023.
- 3 The Plan is a good example of a neighbourhood plan. It includes a variety of policies and seeks to bring forward positive and sustainable development in the neighbourhood area. There is a very clear focus on three specific matters. The first is ensuring that the development takes account of defined settlement boundaries. The second is the proposed designation of a series of Local Green Spaces. The third is the development of a package of policies to safeguard the setting of the village in its landscape setting.
- 4 The Plan has been underpinned by community support and engagement. All sections of the community have been engaged in its preparation.
- 5 Subject to a series of recommended modifications set out in this report, I have concluded that the Plan meets all the necessary legal requirements and should proceed to referendum.
- 6 I recommend that the referendum should be held within the neighbourhood area.

Andrew Ashcroft
Independent Examiner
7 November 2023

1 Introduction

- 1.1 This report sets out the findings of the independent examination of the Reach Neighbourhood Development Plan 2023-2031 ('the Plan').
- 1.2 The Plan was submitted to East Cambridgeshire District Council (ECDC) by Reach Parish Council (RPC) in its capacity as the qualifying body responsible for preparing the neighbourhood plan.
- 1.3 Neighbourhood plans were introduced into the planning process by the Localism Act 2011. They aim to allow local communities to take responsibility for guiding development in their area. This approach was subsequently embedded in the National Planning Policy Framework (NPPF) in 2012, 2018, 2019, 2021 and 2023. The NPPF continues to be the principal element of national planning policy.
- 1.4 The role of an independent examiner is clearly defined in the legislation. I have been appointed to examine whether the submitted Plan meets the basic conditions and Convention Rights and other statutory requirements. It is not within my remit to examine or to propose an alternative plan, or a potentially more sustainable plan except where this result from my recommended modifications to ensure that the plan meets the basic conditions and the other relevant requirements.
- 1.5 A neighbourhood plan can be narrow or broad in scope and can include whatever range of policies it sees as appropriate to its designated neighbourhood area. The submitted Plan has been designed to be distinctive in general terms, and to be complementary to the existing development plan. It seeks to provide a context in which the neighbourhood area can maintain its character and appearance.
- 1.6 Within the context set out above, this report assesses whether the Plan is legally compliant and meets the basic conditions that apply to neighbourhood plans. It also considers the content of the Plan and, where necessary, recommends changes to its policies and supporting text.
- 1.7 This report also provides a recommendation as to whether the Plan should proceed to referendum. If this is the case and that referendum results in a positive outcome the Plan would then become part of the wider development plan and be used to determine planning applications in the neighbourhood area.

2 The Role of the Independent Examiner

- 2.1 The examiner's role is to ensure that any submitted neighbourhood plan meets the relevant legislative and procedural requirements.
- 2.2 I was appointed by ECDC, with the consent of RPC, to conduct the examination of the Plan and to prepare this report. I am independent of both ECDC and RPC. I do not have any interest in any land that may be affected by the Plan.
- 2.3 I possess the appropriate qualifications and experience to undertake this role. I am a Director of Andrew Ashcroft Planning Limited. In previous roles, I have over 40 years' experience in various local authorities at either Head of Planning or Service Director level and more recently as an independent examiner. I am a chartered town planner and have significant experience of undertaking other neighbourhood plan examinations and health checks. I am a member of the Royal Town Planning Institute and the Neighbourhood Planning Independent Examiner Referral System.

Examination Outcomes

- 2.4 In my role as the independent examiner of the Plan I am required to recommend one of the following outcomes of the examination:
- (a) that the Plan as submitted should proceed to a referendum; or
 - (b) that the Plan should proceed to referendum as modified (based on my recommendations); or
 - (c) that the Plan does not proceed to referendum on the basis that it does not meet the necessary legal requirements.
- 2.5 The outcome of the examination is set out in Section 8 of this report.

Other examination matters

- 2.6 In examining the Plan, I am required to check whether:
- the policies relate to the development and use of land for a designated neighbourhood plan area; and
 - the Plan meets the requirements of Section 38B of the Planning and Compulsory Purchase Act 2004 (the Plan must specify the period to which it has effect, must not include provision about development that is excluded development, and must not relate to more than one neighbourhood area); and
 - the Plan has been prepared for an area that has been designated under Section 61G of the Localism Act and has been developed and submitted for examination by a qualifying body.
- 2.7 I have addressed the matters identified in paragraph 2.6 of this report and am satisfied that they have been met.

3 Procedural Matters

3.1 In undertaking this examination I have considered the following documents:

- the submitted Plan.
- the Basic Conditions Statement.
- the Consultation Statement.
- the SEA/HRA screening report (August 2021).
- the Reach Design Code.
- the Reach Landscape Appraisal.
- the Reach Local Green Spaces Appraisal.
- the Reach Local Heritage Appraisal.
- the Reach Biodiversity Appraisal.
- the Planning Inspector's decision letter on planning application 15/01558/OUT.
- the representations made to the Plan.
- RPC's responses to the clarification note.
- the adopted East Cambridgeshire Local Plan (2015).
- the Single-Issue Review of the Local Plan.
- the East Cambridgeshire District Council Natural Environment Supplementary Planning Document (September 2020)
- the National Planning Policy Framework (September 2023).
- Planning Practice Guidance.
- relevant Ministerial Statements.

3.2 I visited the neighbourhood area on 7 September 2023. I looked at its overall character and appearance and at those areas affected by policies in the Plan in particular.

3.3 It is a general rule that neighbourhood plan examinations should be held by written representations only. Having considered all the information before me, including the representations made to the submitted plan, I concluded that the Plan could be examined by way of written representations. I was assisted in this process by the comprehensive nature of many of the representations and the professional way in which the Plan has been developed.

4 Consultation

Consultation Process

- 4.1 Policies in made neighbourhood plans become the basis for local planning and development management decisions. As such the regulations require neighbourhood plans to be supported and underpinned by public consultation.
- 4.2 In accordance with the Neighbourhood Planning (General) Regulations 2012 (as amended), RPC prepared a Consultation Statement. It is proportionate to the neighbourhood area and its policies. It is a very good example of a Statement of this type. It is commendably brief with the various details set out in a series of appendices.
- 4.3 The Statement records the various activities that were held to engage the local community and the feedback from each event. Section 3 sets out details of the comprehensive range of consultation events that were carried out in relation to the initial stages of the Plan.
- 4.4 The Statement also provides specific details on the consultation processes that took place on the pre-submission version of the Plan (June to July 2021). Sections 5 and 6 of the Statement advise about the extent to which the Plan was refined as the outcome of this process.
- 4.5 Public comment on the Plan is divided. Some parishioners offer their support to the Plan. Others have objected to the way in which the Development Envelope has been redrawn from that included in the adopted Local Plan. Comments were also received about the way in which RPC engaged with the community and took on board its comments. I have considered these matters very carefully and have considered RPC's detailed note on this matter in its response to the clarification note. On the balance of the evidence, I am satisfied that RPC has properly fulfilled its obligations on this matter. Plainly a consultation process is not guaranteed to satisfy all parties. This is recognised in the neighbourhood plan process by the inclusion of a community referendum.
- 4.6 In the round I am satisfied that consultation has been an important element of the Plan's production. Advice on the neighbourhood planning process has been made available to the community in a positive and direct way by those responsible for the Plan's preparation. From all the evidence provided to me as part of the examination, I can see that the Plan has promoted an inclusive approach to seeking the opinions of all concerned throughout the process. ECDC has carried out its own assessment that the consultation process has complied with the requirements of the Regulations.

Consultation Responses

- 4.7 Consultation on the submitted plan was undertaken by ECDC. It ended on 3 August 2023. This exercise generated representations from the following organisations:
 - Cambridgeshire County Council

- Coal Authority
- East Cambridgeshire District Council
- Environment Agency
- Historic England
- Isleham Parish Council
- National Highways
- Natural England
- Norfolk County Council

4.8 As highlighted in paragraph 4.5 of this report, comments were also received from several parishioners. I have taken account of all the representations in preparing this report. Where it is appropriate to do so, I refer to specific representations on a policy-by-policy basis.

5 The Neighbourhood Area and the Development Plan Context

The Neighbourhood Area

- 5.1 The neighbourhood area is the parish of Reach. Its population in 2011 was 358 persons living in 139 households. Reach is a small village which sits 11 miles to the northeast of Cambridge and 5 miles to the east of Newmarket. It was designated as a neighbourhood area on 18 February 2019.
- 5.2 Reach is a compact settlement lying on the fen edge. As the Plan comments, virtually all the housing in the village has been built on low-lying chalk abutting the fen soils between three and ten metres above sea level. The village's form reflects its past and its relationship with the landscape. It has remained largely unchanged for several centuries. It is defined by an artificial spine of the Devils Dyke - Fair Green - The Hythe and Reach Lode that runs through the entirety of the parish and reflects land use going back to at least the Saxon Period. The Devil's Dyke is the largest Anglo-Saxon earthworks in the country. Fair Green hosts Reach Fair which is one of England's oldest festivals, having received its charter from King John in 1201. Its historic core is a designated conservation area.
- 5.3 The remainder of the neighbourhood area is fen countryside.

Development Plan Context

- 5.4 The East Cambridgeshire Local Plan was adopted in April 2015. An amendment to Policy Growth 1 was adopted in October 2023. It sets out the basis for future development in East Cambridgeshire up to 2031.
- 5.5 Policies Growth 1-4 set the scene for new development in East Cambridgeshire. Policy Growth 2 sets out the following important principles:
- *The majority of development will be focused on the market towns of Ely, Soham and Littleport. Ely is the most significant service and population centre in the district, and will be a key focus for housing, employment, and retail growth. More limited development will take place in villages which have a defined development envelope, thereby helping to support local services, shops, and community needs.*
 - *Within the defined development envelopes housing, employment, and other development to meet local needs will normally be permitted – provided there is no significant adverse effect on the character and appearance of the area and that all other material planning considerations are satisfied.*
 - *Outside defined development envelopes, development will be strictly controlled, having regard to the need to protect the countryside and the setting of towns and villages.*
- 5.6 Reach has a separate section in the Local Plan (8.29) and an inset map (8.33). Section 8.29 comments as follows:

‘Reach is likely to continue to grow at a slow rate, with new housing being built on suitable ‘infill’ sites within the village. No new housing allocation sites are proposed on the edge of Reach. A ‘development envelope’ has been drawn around Reach to define the built-up part of the village where infill development may be permitted. The purpose is to prevent sprawl into the open countryside. Development on infill sites will need to be in line with Policy Growth 2. Outside the development envelope, housing will not normally be permitted – unless there are exceptional circumstances, such as essential dwellings for rural workers, or affordable housing. Housing schemes outside the development envelope will be assessed against Policy Growth 2 and other Local Plan policies as appropriate.

There are few current businesses in the village. The District Council is keen to retain the stock of business land and premises in order to support local economic growth. Proposals to re-use any employment sites for other purposes will only be permitted in certain circumstances (see Policy EMP 1). No new employment allocation sites are proposed on the edge of Reach. However, a new employment allocation is proposed on Reach Road in Burwell, only a mile or so from the village. Suitable new employment proposals within or on the edge of Reach will be supported in principle, subject to Policies EMP 2, EMP 3 and EMP 4.’

5.7 The following other policies in the Local Plan are also relevant to the submitted Plan:

- Policy HOU1 Housing Mix
- Policy ENV1 Landscape and Settlement Character
- Policy ENV2 Design
- Policy ENV11 Conservation Area
- Policy ENV12 Listed Buildings
- Policy COM3 Retaining Community Facilities

5.8 The submitted Plan has been prepared within its up-to-date development plan context. In doing so, it has relied on up-to-date information and research that has underpinned existing planning policy documents. This is good practice and reflects key elements in Planning Practice Guidance on this matter. The submitted Plan seeks to add value to the different components of the development plan and to give a local dimension to the delivery of its policies. This is captured in the Basic Conditions Statement.

Visit to the neighbourhood area

5.9 I visited the neighbourhood area on 7 September 2023. I approached it from Burwell. This helped me to understand its position in the wider landscape in general and its accessibility to the strategic road network (B1102).

5.10 During this part of the visit I looked at the proposed Important Gap to the east of the village.

- 5.11 I then took the opportunity to look at Devil's Dyke. I saw its scale and significance both in the village and in the surrounding landscape. I enjoyed a walk for a few hundred metres to the south along the footpath to stretch my legs after the journey.
- 5.12 I then looked at the village centre and the Fair Green. I also saw the importance of the Village Hall, the Church, and the Dyke's End public house. I saw the significance of the war memorial. I appreciated the tranquillity of the village and the way in which the buildings related to the Fair Green. I read something of its history on the plaque on Hill Farm.
- 5.13 Thereafter I walked along Chapel Lane to look as best I could at the disputed development envelope at 16 Chapel Lane. I walked along the public footpaths to the north and south of the property.
- 5.14 I then looked at the other proposed Local Green Spaces proposed in the Plan. I also took the opportunity to walk out into the surrounding countryside along the well-used footpath network.
- 5.15 I left the neighbourhood area by driving to the south and east along the Swaffham Road. This helped me to understand the parish's position in the wider landscape and its accessibility to other settlements in this part of the District. During this part of the visit, I looked at the proposed Important Gap to the south of the village.

6 The Neighbourhood Plan and the Basic Conditions

- 6.1 This section of the report deals with the submitted neighbourhood plan as a whole and the extent to which it meets the basic conditions. The submitted Basic Conditions Statement has helped in the preparation of this section of the report. It is an informative and well-presented document.
- 6.2 As part of this process, I must consider whether the submitted Plan meets the basic conditions as set out in paragraph 8(2) of Schedule 4B of the Town and Country Planning Act 1990. To comply with the basic conditions, the Plan must:
- have regard to national policies and advice contained in guidance issued by the Secretary of State;
 - contribute to the achievement of sustainable development;
 - be in general conformity with the strategic policies of the development plan in the area;
 - be compatible with European Union (EU) obligations and European Convention on Human Rights (ECHR); and
 - not breach the requirements of Chapter 8 of Part 6 of the Conservation of Habitats and Species Regulations 2017.

I assess the Plan against the basic conditions under the following headings.

National Planning Policies and Guidance

- 6.3 For the purposes of this examination the key elements of national policy relating to planning matters are set out in the National Planning Policy Framework 2023 (NPPF).
- 6.4 The NPPF sets out a range of land-use planning principles to underpin both plan-making and decision-taking. The following are particularly relevant to the Reach Neighbourhood Development Plan:
- a plan-led system - in this case the relationship between the neighbourhood plan and the East Cambridgeshire Local Plan;
 - building a strong, competitive economy;
 - recognising the intrinsic character and beauty of the countryside and supporting thriving local communities;
 - taking account of the different roles and characters of different areas;
 - highlighting the importance of high-quality design and good standards of amenity for all future occupants of land and buildings; and
 - conserving heritage assets in a manner appropriate to their significance.
- 6.5 Neighbourhood plans sit within this wider context both generally, and within the more specific presumption in favour of sustainable development. Paragraph 13 of the NPPF indicates that neighbourhoods should both develop plans that support the strategic needs set out in local plans and plan positively to support local development that is outside the strategic elements of the development plan.

- 6.6 In addition to the NPPF I have also taken account of other elements of national planning policy including Planning Practice Guidance and the recent ministerial statements.
- 6.7 Having considered all the evidence and representations available as part of the examination I am satisfied that the submitted Plan has had regard to national planning policies and guidance subject to the recommended modifications in this report. It sets out a positive vision for the future of the neighbourhood area. It includes a series of policies on a range of development and environmental matters. It has a focus on designating local green spaces and refining the Development Envelope for the village.
- 6.8 At a more practical level, the NPPF indicates that plans should provide a clear framework within which decisions on planning applications can be made and that they should give a clear indication of how a decision-maker should react to a development proposal (paragraph 16d). This was reinforced with the publication of Planning Practice Guidance. Paragraph ID: 41-041-20140306 indicates that policies in neighbourhood plans should be drafted with sufficient clarity so that a decision-maker can apply them consistently and with confidence when determining planning applications. Policies should also be concise, precise, and supported by appropriate evidence.
- 6.9 As submitted the Plan does not fully accord with this range of practical issues. Most of my recommended modifications in Section 7 relate to matters of clarity and precision. They are designed to ensure that the Plan fully accords with national policy.

Contributing to sustainable development

- 6.10 There are clear overlaps between national policy and the contribution that the submitted Plan makes to achieving sustainable development. Sustainable development has three principal dimensions – economic, social, and environmental. The submitted Plan has set out to achieve sustainable development in the neighbourhood area. In the economic dimension, the Plan includes a policy for residential development (Policy RCH2) and policies for employment development (Policies RCH4 and 5). In the social role, it includes a policy on local green spaces (Policy RCH9), and a policy on community facilities (Policy RCH17). In the environmental dimension, the Plan positively seeks to protect its natural, built, and historic environment. It has policies on design (Policy RCH12), on buildings of local significance (Policy RCH11), and on various aspects of landscape quality (Policy RCH6). This assessment overlaps with the details on this matter in the submitted Basic Conditions Statement.

General conformity with the strategic policies in the development plan

- 6.11 I have already commented in detail on the development plan context in East Cambridgeshire in paragraphs 5.4 to 5.8 of this report.
- 6.12 I consider that the submitted Plan delivers a local dimension to this strategic context and supplements the detail already included in the adopted development plan. Subject to the recommended modifications in this report, I am satisfied that the submitted Plan is in general conformity with the strategic policies in the development plan.

Strategic Environmental Assessment

- 6.13 The Neighbourhood Plan (General) (Amendment) Regulations 2015 require a qualifying body either to submit an environmental report prepared in accordance with the Environmental Assessment of Plans and Programmes Regulations 2004 or a statement of reasons why an environmental report is not required.
- 6.14 In order to comply with this requirement, ECDC undertook a screening exercise in August 2021 on the need or otherwise for a Strategic Environmental Assessment (SEA) to be prepared for the Plan. The report is thorough and well-constructed. It concludes that the Plan is unlikely to have a significant effect on the environment and therefore does not require a SEA.

Habitats Regulations Assessment

- 6.15 ECDC also prepared a Habitats Regulations Assessment (HRA) of the Plan at the same time. It assesses the potential impact of the Plan's policies on the following protected sites outside the parish:
- Fenland SAC (including Wicken Fen, Woodwalton Fen and Chippenham Fen Ramsar);
 - Ouse Washes SAC/SPA/Ramsar;
 - Devil's Dyke SAC; and
 - Breckland SAC/SPA
- 6.16 The HRA concludes that the neighbourhood plan will not give rise to likely significant effects on these protected sites, either alone or in combination with other plans or projects, and that Appropriate Assessment is not required.
- 6.17 Having reviewed the information provided to me as part of the examination, I am satisfied that a proportionate process has been undertaken in accordance with the various regulations. None of the statutory consultees have raised any concerns about these matters. In the absence of any evidence to the contrary, I am entirely satisfied that the submitted Plan is compatible with this aspect of neighbourhood plan regulations.

Human Rights

- 6.18 In a similar fashion I am satisfied that the submitted Plan has had regard to the fundamental rights and freedoms guaranteed under the European Convention on Human Rights (ECHR) and that it complies with the Human Rights Act. There is no evidence that has been submitted to me to suggest otherwise. There has been full and adequate opportunity for all interested parties to take part in the preparation of the Plan and to make their comments known. On this basis, I conclude that the submitted Plan does not breach, nor is in any way incompatible with the ECHR.

Summary

- 6.19 On the basis of my assessment of the Plan in this section of my report I am satisfied that it meets the basic conditions subject to the incorporation of the recommended modifications contained in this report.

7 The Neighbourhood Plan policies

- 7.1 This section of the report comments on the policies in the Plan. It makes a series of recommended modifications to ensure that the various policies have the necessary precision to meet the basic conditions.
- 7.2 The recommendations focus on the policies in the Plan given that the basic conditions relate primarily to this aspect of neighbourhood plans. In some cases, I have also recommended changes to the associated supporting text.
- 7.3 I am satisfied that the content and the form of the Plan is fit for purpose. It is distinctive and proportionate to the neighbourhood area. The wider community and RPC have spent time and energy in identifying the issues and objectives that they wish to be included in their Plan. This sits at the heart of the localism agenda. The Plan has two important elements. The first is the way in which several of the policies are directly underpinned by technical Appraisals. The second is its clear and attractive presentation. The structure of the Plan and its policies is very understandable and the use of colour and well-chosen photographs makes the document very attractive and user-friendly.
- 7.4 The Plan has been designed to reflect Planning Practice Guidance (ID:41-004-20190509) which indicates that neighbourhood plans should address the development and use of land. It includes two non-land use Community Actions.
- 7.5 I have addressed the policies in the order that they appear in the submitted Plan. I address the Community Actions thereafter.
- 7.6 For clarity, this section of the report comments on all the Plan's policies.
- 7.7 Where modifications are recommended to policies they are highlighted in bold print. Any associated or free-standing changes to the text of the Plan are set out in italic print.

The initial parts of the Plan (Sections 1 to 4)

- 7.8 The Plan is very well-organised and presented. It has been prepared with much attention to detail and local pride. It makes an appropriate distinction between the policies and their supporting text.
- 7.9 The initial elements of the Plan set the scene for the policies. They are proportionate to the neighbourhood area and the subsequent policies. The Introduction comments about the way in which the Plan was prepared and when the neighbourhood area was designated. It properly identifies the Plan period (in paragraph 1.6) and the neighbourhood area itself (in Map 1). It also comments about the way in which the Plan was prepared. The breakdown of events overlaps with the Consultation Statement.
- 7.10 Section 2 provides information about the neighbourhood area. It provides interesting and comprehensive details which help to set the scene for the eventual policies.
- 7.11 Section 3 comments about national and local planning policies which influenced the work on the Plan. It refers both to the NPPF and to the adopted Local Plan.

- 7.12 Section 4 sets out the vision and objectives for the Plan. It makes a strong functional relationship between the various issues and, in several cases, they feed directly into the resulting policies. The Vision neatly summarises the ambition for the parish as follows:

'In 2031 Reach will have retained its distinct identity where limited sustainable development has taken place that meets identified needs of the local community; respects the high quality historic and natural environment; embraces new technology; makes a positive contribution towards reducing the impact of climate change; and increases levels of biodiversity.'

- 7.13 The Vision is underpinned by fifteen objectives. They provide the context for the way in which the policies are presented on a topic-by-topic basis in Sections 6-12 of the Plan.
- 7.14 The remainder of this section of the report addresses each policy in turn in the context set out in paragraphs 7.5 to 7.7 of this report.

Policy RCH 1 - Spatial strategy

- 7.15 This policy proposes a spatial strategy for the parish established around a defined Development Envelope (DE). The DE is shown on Map 4 and the Policies Map. It seeks to ensure that new development is in a sustainable location.
- 7.16 The policy itself takes a positive approach to this matter and has regard to national policy. Its first part provides a context for new development within the DE. Its second part comments about development proposals outside the DE. Nevertheless, I recommend modifications to the wording used to bring the clarity required by the NPPF. In the first part of the policy, I recommend the removal of the unnecessary use of 'in principle' and other associated grammatical changes. In the second part of the policy, I recommend the use of wording more appropriate to a neighbourhood plan and other changes so that its wording is internally consistent. Otherwise, the policy itself meets the basic conditions. It will contribute to the delivery of each of the three dimensions of sustainable development.
- 7.17 The Plan proposes the removal of a section of land at 16 Chapel Lane from the DE as included in the Local Plan. Paragraph 5.3 loosely comments that this decision is based on recent planning decisions and other changes which have taken place since the Local Plan was adopted. In its response to the clarification note, RPC commented that the two planning decisions were as follows:

15/01558/OUT Construction of two dwellings and private access drive North View House, 16 Chapel Lane, Reach, Cambridge CB25 0JJ. Refused 11 May 2016. Appeal Dismissed 20 March 2017

The inspector's decision letter on this proposal comments about the relationship of the site both to the village and the countryside (paragraph 14), the intensification of development on the site (paragraph 16), and the relationship between the density on the site and that in the overall village (paragraph 17).

21/01315/FUL Construction of wooden summer house and wooden shed, both on concrete slabs North View House, 16 Chapel Lane, Reach, Cambridge, CB25 0JJ
Approved 1 November 2021

- 7.18 As best I could I looked carefully at the part of the curtilage of 16 Chapel Lane which is proposed to be removed from the DE as set out in the adopted Local Plan. I saw that the northern boundary of the property was defined by a dense conifer hedge. I was able to achieve a better view from the footpath to the south. I saw the open nature of the garden and the location of the summerhouse. I also saw that the triangular part of the garden (in the northern part of the curtilage) was separated from the other part of the garden by a post and rail fence.
- 7.19 I have considered the proposed refinement of the DE very carefully. On the one hand a case could be made for the retention of the DE as shown in the Local Plan. Such an approach would reflect the curtilage of 16 Chapel Lane and acknowledge that the development management process has been sufficiently robust to safeguard the character of land within the DE. On the other hand, RPC has responded to planning history since the Local Plan was adopted and ECDC in its representation advises that it is content that a parish council has taken an appropriate and evidence-based approach to the matter.
- 7.20 On the balance of the evidence, I am satisfied that the approach taken in the Plan is well-considered and meets the basic conditions. I have reached this conclusion for the following reasons:
- its relationship with recent planning history on the site;
 - the parcel of land concerned relates more closely to the countryside to the north, west and east than to the built form of the village to the south of 16 Chapel Lane. This overlaps with the Inspector's conclusion in 2017;
 - RPC has taken a measured decision based on evidence which has come forward since the adoption of the Local Plan.
- 7.21 In reaching this conclusion I am satisfied that the DE as proposed in the Plan is in general conformity with the strategic policies in the Local Plan. The limited nature of the proposed reduction in the scale of the DE does not affect the overall approach taken in Policies Growth 1-4 of the adopted Local Plan or the overall ability of Reach to bring forward the type of development anticipated in that Plan.

In the first part of the policy replace 'Sustainable development proposals within the Envelope will be supported in principle, subject to being of an appropriate scale and not having an unacceptable impact on:' with 'Sustainable development proposals within the Envelope will be supported where they are of an appropriate scale and do not have an unacceptable impact on:'

In the second part of the policy replace 'will only be permitted where it is essential' with 'will only be supported where they are essential'

Policy RCH2 - Housing Development

- 7.22 This policy sets out the way in which the parish will deliver new housing in the Plan period. It is based on the delivery of sites already committed and infill sites which may come forward within the DE.
- 7.23 I am satisfied that the policy takes a balanced and pragmatic approach which has regard to national policy and is in general conformity with Policy Growth 2 of the Local Plan. In this context it meets the basic conditions. It will contribute to the delivery of each of the three dimensions of sustainable development.

Policy RCH3 - Housing Mix

- 7.24 This policy seeks to ensure that new development should meet the housing needs of the parish. It offers support to the development of three-bedroom houses. The policy is underpinned by information on housing sizes in the supporting text.
- 7.25 In its response to the clarification note, RPC updated the relevant information referenced in the supporting text and suggested that the scope of the policy could be reconsidered. Based on the evidence, I recommend that the policy offers support to homes with one, two or three bedrooms. Given that the policy is supportive in nature (rather than requiring any specific mix for housing developments) I am satisfied that this approach is entirely appropriate. I also recommend modifications to the wording of the first sentence of the policy so that it is more clearly related to the development management process and uses language more appropriate for a neighbourhood plan. Otherwise, the policy meets the basic conditions. It will contribute to the delivery of the social dimension of sustainable development.

In the first sentence replace ‘Housing development must’ with ‘Proposals for housing development should’

Replace the second sentence with ‘Proposals that deliver homes with one, two or three bedrooms will be supported.’

Policy RCH4 - New Businesses and Employment

- 7.26 This policy sets out the Plan’s approach to small scale business development including working from home. It has a focus on securing new development within the defined DE. The policy establishes a series of environmental safeguards.
- 7.27 The supporting text (paragraphs 7.1 to 7.4) sets out the context to this important matter. It highlights the significance of home working in the parish.
- 7.28 As submitted, the policy is a long and complicated single sentence. As such it may be difficult to apply clearly through the development management process. I recommend that the various environmental safeguards are set out as criteria. This will break up the policy and bring the clarity required by the NPPF. I also recommend specific modifications to some of the criteria to bring the clarity required by the NPPF. The scope of the criteria remains unaffected by the recommended approach. Otherwise, the policy meets the basic conditions. It will contribute to the delivery of the economic dimension of sustainable development.

Replace ‘will be supported.... built environment’ with ‘will be supported where there is no unacceptable impact on:

- the amenity of residents in the immediate locality by reason of noise, smell, vibration, overlooking, overshadowing, loss of light, other pollution (including light pollution); or
- the volume or type of vehicular activity generated; or
- the character or appearance of the built environment.’

Policy RCH5 - Farm Diversification

- 7.29 This policy consolidates the approach taken in the previous policy. In this case, it offers support for proposals for the use of redundant traditional agricultural buildings.
- 7.30 In the round I am satisfied that the approach taken has regards to national policy. It will assist in bringing forward sustainable economic development and securing the longer-term use of traditional farm buildings. Nevertheless, I recommend that the policy is recast so that it more properly relates to the development management process and identifies specific matters which such proposals should demonstrate. Otherwise, the policy meets the basic conditions. It will contribute to the delivery of the economic dimension of sustainable development.

Replace the policy with: ‘Proposals for the use of redundant traditional farm buildings and other rural buildings for employment purposes will be supported where it can be demonstrated that the buildings concerned are no longer viable or needed for agricultural uses.’

Policy RCH6 - Landscape Quality

- 7.31 This is a wide-ranging policy of landscape quality. It addresses the following matters:
- the rural character and identity of the village;
 - the identification of settlement gaps; and
 - the need to safeguard identified Important Views.
- 7.32 The policy is underpinned by the Landscape Appraisal and the Landscape Appraisal Development Guidelines (Table 1 of the Plan). Paragraphs 8.1 to 8.8 of the Plan helpfully summarise the contents of this work.
- 7.33 In the round I am satisfied that the policy takes a positively approach to these matters. The settlement gaps helpfully respect the way in which the village sits within the wider surrounding landscape. The Important Views neatly capture the character of the village and its relationship with the countryside.
- 7.34 Within this broader context, I recommend that the opening element of the policy is modified so that it can be applied proportionately by ECDC. Plainly the policy will apply differently to individual proposals (or in some cases not at all). I also recommend specific modifications to the wording used in the details of the policy to bring the clarity required by the NPPF. Otherwise, the policy meets the basic conditions. It will contribute to the delivery of the environmental dimension of sustainable development.

Replace the opening element of the policy with: ‘As appropriate to their scale, nature and location development proposals should:’

In ii delete ‘would’

In iii replace ‘detrimental’ with ‘unacceptable’

In iv replace ‘have regard’ to ‘respond positively’

Policy RCH7 - Green Infrastructure

- 7.35 This proposal has two related purposes. Firstly, it offers support for proposals which would enhance green infrastructure. Secondly, it seeks to safeguard green infrastructure from the effects of development proposals. The Network is shown on Map 6 and is underpinned by the details in the Biodiversity Assessment.
- 7.36 In the round I am satisfied that the policy has been well-researched and is distinctive to the parish. In addition, it takes a non-prescriptive approach and recognises that special circumstances may justify granting planning permission to proposals which would have an impact on the Network.
- 7.37 Within this context I recommend that the policy explicitly identifies the Network rather than referring to it more generally. I also recommend that the order of the policy is reversed so that it has a more natural positive focus. I also recommend other modifications to the wording used so that the policy has the clarity required by the NPPF.
- 7.38 The policy comments that the identified Local Green Spaces form part of the Network. Whilst I am satisfied that this is the case, the proposed Local Green Spaces are addressed in a separate policy in the Plan (RCH9). That policy follows the national format towards LGSs. In these circumstances I recommend that the overlap is addressed in the supporting text rather than policy. Otherwise, the policy meets the basic conditions. It will contribute to the delivery of the environmental dimension of sustainable development.

Replace the policy with:

‘The Plan identifies a Green Infrastructure Network on Map 6 (and as shown on the Policies Map).

Proposals which will reinforce, link, buffer and create new green infrastructure, or which would promote, manage, and interpret the identified Green Infrastructure Network and enhance its public enjoyment will be supported.

Development proposals which would result in the loss or an unacceptable harm to the Green Infrastructure Network will not be supported except where it can be satisfactorily demonstrated that the need for and benefits of the development substantially outweigh any impacts on the Network.’

At the end of paragraph 8.18 add: ‘The Network includes the identified Local Green Spaces as set out in Policy RCH9. That policy follows the format as set out in the NPPF

towards Local Green Spaces. As such any proposals which affect Local Green Spaces will be determined based on the contents of Policy RCH9 rather than Policy RCH7.'

Policy RCH8 – Biodiversity

- 7.39 This is a wide-ranging policy on biodiversity. The approach taken is underpinned by the submitted Reach Biodiversity Assessment.
- 7.40 Paragraph 8.19 of the Plan advises that the policy 'repeats Policy SPD.NE6 of the Natural Environment Supplementary Planning Document and is included in the Plan to give it a formal status in the East Cambridgeshire Development Plan'
- 7.41 The ECDC Supplementary Planning Document (SPD) was adopted in September 2020. Paragraph 1.2 of that Document advises that its purpose is:
- 'to provide advice on policy requirements relating to the natural environment, including issues such as a 'net gain' in biodiversity through development proposals and technical advice in terms of discharging Habitat Regulation Assessment (HRA) obligations, especially in relation to swan and goose foraging in designated protection zones around the Ouse Washes. This SPD also sets out the Council's position in relation to the recently adopted Local Nature Partnership vision to 'double land for nature' by 2050 across Cambridgeshire (a vision also endorsed by the Combined Authority in July 2019). The SPD also touches upon issues coming forward in the Environment Bill, January 2020.'*
- 7.42 In its representation on the submitted Plan ECDC comments that:
- 'matters have clearly moved on considerably since that Reg 14 consultation stage, with mandatory Biodiversity Net Gain (BNG) now set to commence from Nov 2023 (for major development) and April 2024 (minor development). The implementation of mandatory BNG will be via extensive government legislation and guidance. In this context, it is now considered inappropriate for a Neighbourhood Plan to repeat such requirements (or, worse, establish policy which has the potential to contradict legislation). As such, the District Council therefore recommends that Policy RCH 8 be scaled back considerably to just the last paragraph (with appropriate adjustment).'*
- 7.43 In its response to the clarification note RPC commented that the policy:
- 'acknowledges that it would become redundant when the provisions of the Environment Act 2021 are implemented. While it is acknowledged that the implementation of the Act has moved on since the Plan was submitted, most development in the Neighbourhood Area is expected to fall into the "small sites" category, where developments will currently not be required to meet a biodiversity net gain until April 2024. Even when the Act is fully operational, elements of the policy would still be relevant in terms of how planning applications would be considered and appropriate measures that would be supported for householder applications.'*
- 7.44 It is common ground that the wider issue of biodiversity net gain is evolving as national legislation is produced. ECDC responded to this matter by producing the SPD in 2020. The evolving nature of national legislation makes the development of a neighbourhood

plan policy for the Plan period rather challenging. RPC has acknowledged this by indicating that elements of the policy will not apply when national legislation addresses biodiversity net gain.

- 7.45 I have considered this matter very carefully. Given that the policy repeats the contents of the relevant part of the SPD and that it readily indicates that it will not apply as and when national legislation is introduced, I recommend that the policy is deleted. In reaching this conclusion I am satisfied that the adoption of the SPD provides ECDC with the appropriate mechanisms to administer its provisions in the neighbourhood area until such time as it is replaced by national legislation, or is updated to respond to national legislation.
- 7.46 Within this context I recommend that the helpful supporting text is retained with appropriate modifications. It will allow developers and interested parties to understand the policy context insofar as it applies in the parish. In the round this may be a policy which RPC may wish to address in any review of the Plan once the national position has been established.

Delete the policy.

In paragraph 8.15 delete the final sentence.

Replace paragraph 8.19 with:

'At a national level, matters have moved on considerably as the Plan has been prepared with mandatory Biodiversity Net Gain set to commence from January 2024 (for major development) and April 2024 (for minor development). The implementation of mandatory biodiversity net gain will be via extensive government legislation and guidance. In this context, it is not considered appropriate for the Plan to repeat such requirements. Nevertheless, the situation will be carefully monitored throughout the Plan period. Whilst national legislation is unlikely directly to affect householder applications the inclusion of an element of biodiversity gain into such proposals, including bird boxes, insect 'hotels', bee blocks, bat boxes and/or hibernation holes will be welcomed.'

Policy RCH9 - Local Green Spaces

- 7.47 This policy proposes the designation of eight Local Green Spaces (LGSs). Their designation is underpinned by the details in the submitted LGS Appraisal.
- 7.48 I looked at the proposed LGSs carefully during the visit. I saw that in their different ways they either formed important elements of the character of the village or complemented the nature and attractiveness of the surrounding countryside. The Fair Green (LGS1) is particularly iconic in the parish.
- 7.49 Based on all the information available to me, including my own observations, I am satisfied that the proposed LGSs comply with the three tests in paragraph 102 of the NPPF. In addition, I am satisfied that their proposed designation would accord with the more general elements of paragraph 101 of the NPPF. Firstly, I am satisfied that their designation is consistent with the local planning of sustainable development. They do

not otherwise prevent sustainable development coming forward in the neighbourhood area and no such development has been promoted or suggested. Secondly, I am satisfied that the LGSs are capable of enduring beyond the end of the Plan period. Indeed, they are an established element of the local environment and, in most cases, have existed in their current format for many years. In addition, no evidence was brought forward during the examination that would suggest that the proposed local green spaces would not endure beyond the end of the Plan period.

- 7.50 The policy seeks to ensure that the local approach reflects the national approach as set out in paragraph 103 of the NPPF. In general terms it does so to good effect. Nevertheless, I recommend the deletion of the unnecessary final sentence which comments about permitted development rights. Otherwise, the policy meets the basic conditions. It will contribute to the delivery of the social and the environmental dimensions of sustainable development.

Delete the final sentence of the policy

Policy RCH10 - Heritage Assets

- 7.51 This is a comprehensive policy on heritage assets. It includes the conservation area, listed buildings, and scheduled monuments. Details of designated heritage assets are contained in Appendix 2 of the Plan
- 7.52 The policy takes a positive approach to this matter and has regard to national policy (as principally set out in Section 16 of the NPPF). I recommend that the opening element of the policy is modified so that it more closely relates to the development management process and can be applied in a proportionate way by ECDC. Otherwise, the policy meets the basic conditions. It will contribute to the delivery of the social and the environmental dimensions of sustainable development.

Replace the opening element of the policy with: ‘As appropriate to their scale, nature and location development proposals should’

Policy RCH11 - Buildings of Local Significance

- 7.53 This policy identifies a series of buildings of local significance. The details of the buildings are set out in Appendix 3. The policy applies the approach to the buildings as set out in paragraph 203 of the NPPF.
- 7.54 I looked at some of the proposed buildings of local significance during the visit. I am satisfied that RPC has taken an appropriate approach to this matter which has regard to national policy. In this overall context I recommend that the first part of the policy is recast so that it more closely relates to the development management process. This will bring the clarity required by the NPPF. I also recommend that the order of the second and third paragraphs of the policy are reversed to assist with its interpretation. Otherwise, the policy meets the basic conditions. It will contribute to the delivery of the social and the environmental dimensions of sustainable development.

Replace the first part of the policy with: ‘Development proposals should ensure that the retention and protection of local heritage assets and buildings of local

significance, including buildings, structures, features, and gardens of local interest, are appropriately secured.'

Reverse the order of the second and third parts of the policy.

Policy RCH12 - Design Considerations

- 7.55 This policy sets out the Plan's approach to design. It is supported by the Design Code and the Development Design Checklist (Appendix 4)
- 7.56 In the round the policy is an excellent local response to Section 12 of the NPPF. The various criteria in the policy are both appropriate for inclusion in a neighbourhood plan policy and are very distinctive to the parish.
- 7.57 I recommend that the opening element of the third part of the policy is modified so that it sets out design principles and on a proportionate basis, rather than simply offering support to proposals which meet such principles. In addition, I recommend specific modifications to the various design principles so that they have the clarity required by the NPPF and can be applied consistently by ECDC throughout the Plan period. In this context I recommend the deletion of the final criterion on the provision of electric car recharging facilities as this matter is now addressed by Part S of the Building Regulations. Otherwise, the policy meets the basic conditions. It will contribute to the delivery of the social dimension of sustainable development.

In the third part of the policy replace 'In addition, proposals will be supported where they:' with 'In addition, and as appropriate to their scale nature and location development proposals should be designed so that they:'

In c. replace 'affect adversely' with 'unacceptably affect'

In e. replace 'significantly and adversely' with 'unacceptably'

In h. replace 'possible' with 'practicable'

Delete I.

Policy RCH13 - Mitigating the risk of flooding from development

- 7.58 This policy seeks to safeguard the parish from surface water flooding. It offers support for the incorporation of sustainable drainage systems into development proposals. It also sets out details about the information which should be included with relevant planning applications.
- 7.59 In general terms, the policy takes a positive approach to this matter. It reflects the drainage profile of the parish and has regards to national policy as set out in Section 14 of the NPPF. I recommend specific modifications to the first, second and fourth parts of the policy to bring the clarity required by the NPPF. The third part of the policy sets out a preference for the use of sustainable drainage systems. Given that a preference has little weight in a planning policy context, I recommend that this element of the policy is recast. Its purpose remains unaffected. Otherwise, the policy meets the

basic conditions. It will contribute to the delivery of the social and the environmental dimensions of sustainable development.

In the first and second part of the policy replace ‘shall’ with ‘should’

Replace the third part of the policy with: ‘In all locations, sustainable drainage systems for the disposal of surface water should be incorporated into the design and layout of development proposals unless such an approach would be demonstrably unfeasible.’

In the fourth part of the policy replace ‘Systems’ with ‘Sustainable drainage systems’

Policy RCH14 - Sustainable Building

- 7.60 This policy offers support for proposals which would deliver sustainable buildings. It also advises that any such measures are delivered so that they are integral to the building design and minimise any detrimental impact on the building or its surroundings. The second part of the policy sets out specific measures which development proposals should incorporate.
- 7.61 In the round the policy takes a positive approach to this matter. It acknowledges that government is principally addressing the sustainability of buildings through the Building Regulations.
- 7.62 ECDC suggest a series of detailed modifications to the policy and some additions to its content and scope. I have considered those suggestions carefully along with RPC’s response to the clarification note. Taking account of all the relevant information, I recommend that the policy is recast so that it has the clarity required by the NPPF and can be applied consistently through the development management process. I also recommend that the second part of the policy is applied on a proportionate basis. The recommended recast policy includes some elements of the suggestions from ECDC where they help to refine the policy as submitted. However, in most cases whilst the suggestions would broaden the scope and effectiveness of the policy, they are not necessary to ensure that it meets the basic conditions. This approach acknowledges that national legislation provides considerable scope for a qualifying body (here RPC) to include whatever matter and policies in a submitted plan it sees fit for the neighbourhood area. I am satisfied that the recast policy will contribute to the delivery of the social and the environmental dimensions of sustainable development.

Replace the policy with:

‘Proposals that incorporate latest best practice in energy conservation will be supported where such measures are an integral element of the design of the buildings and minimise any impacts on the buildings or their surroundings.

As appropriate to their scale, nature and location development proposals should:

- a. maximise the benefits of solar gain in site layouts and orientation of buildings;**

b. be designed to achieve maximum achievable energy efficiency using a fabric first approach to construction;

c. incorporate non fossil fuel-based heating systems;

d. incorporate sustainable design and construction measures and energy efficiency measures, such as, where feasible, ground/air source heat pumps, solar panels, thermal and PV systems; and

e. make provision for grey water/rainwater, and/or surface water harvesting and recycling.

Wherever practicable, development proposals on peat-based fen soils should consider and offset their carbon losses through the incorporation of commensurate carbon offsetting measures.'

Policy RCH15 - Community Energy Proposals

7.63 This policy comments that proposals for community led renewable energy initiatives, especially those providing a long-term source of income for the community and reducing bills by enabling local supply, will be supported subject to a series of criteria. The policy reflects feedback from the Residents' Survey. The supporting text also comments about the work being undertaken by the Reach Energy Group

7.64 In general terms I am satisfied that the policy meets the basic conditions. However, I recommend two specific modifications so that its approach has the clarity required by the NPPF. Otherwise, the policy meets the basic conditions. It will contribute to the delivery of the social and the environmental dimensions of sustainable development.

Replace the second criterion with 'The proposal is of a proportionate scale to its intended purpose; and'

In the third criterion replace 'adversely' with 'unacceptably'

Policy RCH16 - Dark skies

7.65 This policy comments that outdoor lighting systems should have a minimum impact on the environment, and minimise light pollution and adverse effects on wildlife, subject to highway safety, the needs of individual applicants or groups, and security. It also advises that schemes should reduce the consumption of energy by promoting efficient outdoor lighting technologies, keeping the night-time skies dark and reducing glare.

7.66 The policy reflects the dark skies environment of the parish. As submitted it sets out a preference for 'dark skies over lighting' and has a slightly confusing format in terms of the way in which operational requirements which might justify the need for external lighting will be considered. I recommend that the policy is recast so that it sets out its requirements in a clear and consistent way which will allow ECDC to reach judgements on any planning applications for external lighting or which incorporate external lighting. I also recommend consequential modifications to the supporting text. The recast policy will contribute to the delivery of the social and the environmental dimensions of sustainable development.

Replace the policy with:

‘Wherever practicable, development proposals should not incorporate external lighting.

Any required external lighting systems should be designed to reduce the consumption of energy by promoting efficient outdoor lighting technologies, keeping the night-time skies dark and reducing glare. The details of lighting schemes should minimise their impact on the environment, light pollution, and any effects on wildlife.’

At the end of 10.12 add: ‘Policy RCH16 seeks to address this important issue. Plainly the policy will need to be applied in a flexible way and take account of highway safety issues, the needs of specific applicants, and security.’

Policy RCH17 - Protecting Existing Services and Facilities

- 7.67 This policy seeks to safeguard existing community services and facilities. It sets out the specific circumstances in which proposals which would involve the loss of the community facilities would be supported.
- 7.68 The policy takes a positive approach to this important matter. It correctly acknowledges that the use of community facilities may change within the Plan period, that their commercial viability may alter, and that alternative community facilities may come forward. I recommend a specific modification to the wording used in the policy so that it better applies to a neighbourhood plan and brings the clarity required by the NPPF. Otherwise, the policy meets the basic conditions. It will contribute to the delivery of the social dimension of sustainable development.

Replace ‘permitted’ with ‘supported’

Policy RCH18 - Open Space, Sport, and Recreation Facilities

- 7.69 This policy comments that proposals for the provision, enhancement and/ or expansion of amenity, sport or recreation open space or facilities will be permitted subject to compliance with other development plan policies. It also comments that development proposals which will result in the loss of existing amenity, sport or recreation open space or facilities will not be allowed unless one of two criteria are met.
- 7.70 The policy takes a positive approach to this matter. Nevertheless, I recommend two modifications. The first simplifies the language used for other development plan policies in the opening element of the policy. The second separates the two elements of the policy and uses wording more appropriate for a neighbourhood plan. In both cases the modifications will bring the clarity required by the NPPF, allow ECDC to apply the policy in a clear way and provide consistent policy wording throughout the Plan. Otherwise, the policy meets the basic conditions. It will contribute to the delivery of the social dimension of sustainable development.

Replace the opening element of the policy with:

‘Development proposals for the provision of new sports and recreation open spaces and for enhancement and/ or expansion of existing amenity, sport or recreation open space or facilities (as shown on the Policies Map) will be supported where they comply with other development plan policies.

Development proposals which will result in the loss of existing amenity, sport or recreation open space or facilities will not be supported unless:’

Policy RCH19 - New vehicle-free routes

- 7.71 This policy advises that proposals which would deliver new or improved vehicle-free walking, cycling and equestrian routes to neighbouring villages, or as part of a wider network of provision, will be supported.
- 7.72 The policy relates positively to the character of the parish and its relationship with neighbouring villages. I am satisfied that it meets the basic conditions.

Community Actions

- 7.73 The Plan includes two Community Actions. They are issues where residents of the parish have expressed strong views during the Plan preparation process, but where the issues are not land-use based.
- 7.74 The Actions are included in the main body of the Plan in Sections 6-12. National policy comments that such issues should be incorporated into a separate section of the Plan to distinguish them from the land use policies. However, on the balance of the evidence, I am satisfied that the approach taken in the Plan is appropriate. I have reached this view for three related reasons. The first is that the Aspirations bring added value to the land use policies on a topic-by-topic basis. The second is that they are distinguished from the land use policies using a separate colour to that used for the policies. The third is that the Plan properly comments about their distinction from the policies in paragraph 1.9.
- 7.75 I am satisfied that the Aspirations are appropriate and distinctive to the parish.

Other Matters - General

- 7.76 This report has recommended a series of modifications both to the policies and to the supporting text in the submitted Plan. Where consequential changes to the text are required directly because of my recommended modification to the policy concerned, I have highlighted them in this report. However other changes to the general text may be required elsewhere in the Plan because of the recommended modifications to the policies. Similarly, changes may be necessary to paragraph numbers in the Plan or to accommodate other administrative matters. It will be appropriate for ECDC and RPC to have the flexibility to make any necessary consequential changes to the general text. I recommend accordingly.

Modification of general text (where necessary) to achieve consistency with the modified policies and to accommodate any administrative and technical changes.

Other Matters – Specific

- 7.77 Cambridgeshire County Council’s Public Health Directorate has made a very detailed series of comments on the Plan. In the main the comments support the policies.
- 7.78 However in some cases the County Council has suggested that the effect of policies should be broadened. Such an approach would expand the remit of the Plan and help it to respond to the approach being taken across the County by the Public Health Directorate. Nevertheless, national legislation has given considerable flexibility to qualifying bodies (here RPC) to include whatever matter they see fit in their plans. On this basis I have restricted my recommended modifications to those which are necessary to ensure that the Plan meets the basic conditions.

Other Matters – Update to the Local Plan

- 7.79 On 19 October 2023 ECDC adopted a revision to its Local Plan. It addressed Policy Growth 1 and its associated supporting text and updated the housing requirement figure for East Cambridgeshire as a whole. No other policy in the Local Plan was amended. I am satisfied that the update to Local Plan has had no material effect on the examination of the Reach Neighbourhood Plan. Nevertheless, in a very limited number of places, it would be appropriate for the text of the Plan to be modified to refer to the title of the most up-to-date version of the Local Plan. I recommend accordingly.

Modify all references to the Local Plan to read ‘East Cambridgeshire Local Plan 2015 (as amended 2023)’

8 Summary and Conclusions

Summary

- 8.1 The Plan sets out a range of policies to guide and direct development proposals in the period up to 2031. It is distinctive in addressing a specific set of issues that have been identified and refined by the wider community to safeguard the character and setting of the neighbourhood area and identified Local Green Spaces.
- 8.2 Following the independent examination of the Plan, I have concluded that the Reach Neighbourhood Development Plan meets the basic conditions for the preparation of a neighbourhood plan subject to a series of recommended modifications.

Conclusion

- 8.3 On the basis of the findings in this report, I recommend to East Cambridgeshire District Council that subject to the incorporation of the modifications set out in this report that the Reach Neighbourhood Development Plan should proceed to referendum.

Other Matters

- 8.4 I am required to consider whether the referendum area should be extended beyond the neighbourhood area. In my view, the neighbourhood area is entirely appropriate for this purpose and no evidence has been submitted to suggest that this is not the case. I therefore recommend that the Plan should proceed to referendum based on the neighbourhood area as approved by the District Council on 18 February 2019.
- 8.5 I am grateful to everyone who has helped in any way to ensure that this examination has run in a smooth manner. The responses to the clarification note were detailed, informative and delivered in a very timely fashion.

Andrew Ashcroft
Independent Examiner
7 November 2023